

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

Heriberto Chavez; Evangelina Escarcega,
as the legal representative of her son, Jose
Escarcega; and Jorge Moreno,

Plaintiffs,

v.

Plan Benefit Services, Inc.; Fringe
Insurance Benefits, Inc.; and Fringe Benefit
Group.,

Defendants.

Case No. 1:17-cv-659

**PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs Heriberto Chavez, Evangelina Escarcega as the legal representative of Jose Escarcega, and Jorge Moreno ("Plaintiffs") hereby move for the above-captioned case to be certified as a class action. Plaintiffs' memorandum of law in support of this Motion will be filed under seal in accordance with Local Rule CV-5.2 and the Confidentiality and Protective Order entered in this case. ECF No. 87.

Dated: April 8, 2019

Respectfully submitted,

By: /s/ Nina Wasow

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CERTIFICATE OF SERVICE

I certify that on April 8, 2019, I served a copy of Plaintiffs' Motion for Class Certification via the CM/ECF system on the following:

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